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APR 14 2025

CLERK, U.S. DISTRICT COURT  
~~MINNEAPOLIS, MINNESOTA~~UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**Andrew David Lloyd Miller**

Plaintiff(s),

vs.

Case No. 25-sc-1396-PJS/JFD  
(To be assigned by Clerk of District Court)(Molly Jean Macone )  
**Washington County Court**  
Administration/ Child support  
Division/ State of Minnesota  
(Please see attached list)

DEMAND FOR JURY TRIAL

YES  NO 

Defendant(s).

(Enter the full name(s) of ALL defendants in this lawsuit. Please attach additional sheets if necessary).

**COMPLAINT****PARTIES**

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

## a. Plaintiff

|                  |                                  |
|------------------|----------------------------------|
| Name             | <b>Andrew David Lloyd Miller</b> |
| Street Address   | <b>512 Yellow Brick Circle</b>   |
| County, City     | <b>Carver - Chaska</b>           |
| State & Zip Code | <b>55318</b>                     |
| Telephone Number | <b>(952) 500-1140</b>            |

SCANNED

APR 14 2025 

U.S. DISTRICT COURT MPLS

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name

Street Address

County, City

State & Zip Code

b. Defendant No. 2

Name

Street Address

County, City

State & Zip Code

c. Defendant No. 3

Name

Street Address

County, City

State & Zip Code

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

**JURISDICTION**

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

Federal Question       Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: **Andrew D. L. Miller**      State of Citizenship: **Minnesota**

Defendant No. 1: **Washington County**      State of Citizenship: **Minnesota**

Defendant No. 2: **State of MN**      State of Citizenship: **Minnesota**

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.**

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

Defendant(s) reside in Minnesota     Facts alleged below primarily occurred in Minnesota

Other: explain

**Not all respondent's names are known at this time. Please see attached filings.**

**STATEMENT OF THE CLAIM**

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

**Please see attached list**

**COMPLAINT  
FOR CIVIL  
RIGHTS  
VIOLATIONS  
(42 U.S.C. §§  
1983, 1985, 1986;  
First, Fourth, and**

**Attach additional sheets of paper as necessary.**

**Check here if additional sheets of paper are attached:**

**Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.**

**REQUEST FOR RELIEF**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

**Please See Attached Document**

Signed this \_\_\_\_\_ day of \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Mailing Address      **512 Yellow Brick Circle**  
**Chaska MN 55318**

Telephone Number    **(952) 500-1140**

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

## Basic Civil Rights Complaint Summary

### \*\*1. Wrongful Government Actions & Financial Seizures

- You allege that Washington County Child Support Division unlawfully seized your stimulus checks and tax refunds, including federal COVID relief funds.
- These seizures caused financial hardship for you and your family and potentially violated federal protections tied to relief funds.
- You are seeking reimbursement, compensation, and sanctions for this conduct.

### \*\*2. Systemic Misconduct & Misrepresentation

- You assert that false financial statements and misrepresentations were allowed in your family law case and not properly corrected, impacting child support and enforcement actions.
- You filed motions to correct arrears, penalize false statements, and challenge enforcement actions you believe were based on erroneous or malicious information.

### \*\*3. Violation of Due Process & Fair Hearing Rights

- You claim that multiple procedural errors occurred during your case, including late evidence submissions, unfair rulings, and lack of response from the other party, which undermined your right to a fair trial.
- You are also alleging a lack of impartiality in judicial conduct and have moved for a fair and impartial ruling and sanctions where appropriate.

### \*\*4. Privacy Violations and Unauthorized Access

- You believe you were subject to digital privacy breaches, potentially involving unauthorized access, hacking, or digital surveillance by a third party (possibly Molly's boyfriend).
- You have filed or are refiling a Motion to Investigate Privacy Violations and requested protective orders to safeguard sensitive personal data.

### \*\*5. Violation of Parental Rights and Identity Tampering

- You allege parental interference, including unauthorized name changes of your children in school records without legal authority or your consent.
- You are asserting your right to be involved in legal decisions affecting your children and are challenging those changes through a motion to rectify the wrongful name change.

### \*\*6. Retaliation, Career Harm & Reputational Damage

- You are claiming that the systemic misuse of child support enforcement, including sharing of financial information with employers, caused career setbacks and reputational harm.
- You are seeking compensation for lost opportunities and damages to your professional standing.

### \*\*7. Broad Request for Accountability

- You are requesting a full external investigation into Washington County's conduct, including by the FTC, DOJ Civil Rights Division, and Minnesota Attorney General's Office, FAA and more, and are pursuing \$100,000,000,000+ in damages for the harm caused.

**Named Defendants:**

**Including and Not Limited to the Following:**

1. Molly Macone – 2913 Lake Blvd. St Paul, MN 55109
2. Washington County Child Support Division  
14949 62nd Street N, Stillwater, MN 55082
3. Minnesota Department of Human Services (DHS)  
540 Cedar Street, St. Paul, MN 55101
4. Minnesota Attorney General's Office  
445 Minnesota Street, St. Paul, MN 55101
5. Matthew Miller -Attorney at Law
6. Andrew (LNU) in care of: Molly Macone

**Judicial and Administrative Respondents:**

7. Judge Laura Pietan  
c/o Washington County District Court  
14949 62nd Street N, Stillwater, MN 55082
8. Washington County Court Administrator / Clerk of Court  
14949 62nd Street N, Stillwater, MN 55082

9. Washington County Attorney's Office  
14949 62nd Street N, Stillwater, MN 55082
10. Washington County Administration  
Government Center – Stillwater, MN

**Named and Implicated County Staff:**

11. Amber Clark
12. Mary Jo Blees
13. Heidi Leedom
14. Ashley Klint
15. Andrew Petersen
16. Amy and or Amanda [Last Name Unknown]
17. Angie Bunch
18. Tina [Last Name Unknown – listed as commenter]
19. Theresa Underwood
20. Lauren [Last Name Unknown]
21. To include and not limited to All individuals involved individuals (as listed above) who were involved in the silencing, obstruction and misdirection (etc.) of plaintiffs case matters

(Where individual addresses are unknown, documents are being served c/o Washington County Child Support Division or main court building.)

**State-Level Oversight Bodies:**

22. Minnesota Court of Appeals Clerk  
25 Rev. Dr. Martin Luther King Jr. Blvd., St. Paul, MN 55155
23. Minnesota Board on Judicial Standards / State Court Administrator  
25 Rev. Dr. Martin Luther King Jr. Blvd., St. Paul, MN 55155

Executed on: April 9, 2025

Signature: 

Printed Name: Andrew David Lloyd Miller

Address: 512 Yellow Brick Circle, Chaska, MN 55318

Phone: (952) 500-1140

**UNITED STATES DISTRICT COURT**

**DISTRICT OF MINNESOTA**

**Andrew David Lloyd Miller**

**Plaintiff (Pro Se),**

**v.**

**Molly Macone, individually and as a co-conspirator;**

**Washington County Child Support Division, government agency;**

**Amber Clark**

**Mary Jo Blees**

**Heidi Leedom**

**Ashley Clint**

**Andrew Petersen**

**Amy and or Amanda [Last Name Unknown]**

**Angie Bunch**

**Tina [Last Name Unknown – listed as commenter]**

**Theresa Underwood**

**Lauren [Last Name Unknown]**

**Matthew Miller**

**Andrew (LNU)- Mollys boyfriend**

**Claudia Rosales**

**Peggy Cottrell**

**To include and not limited to All individuals involved individuals (as listed above) who were involved in the silencing, obstruction and misdirection (etc.) of plaintiffs case matters individuals acting under color of law,  
Defendants.**

Case No.: [To be assigned]

**COMPLAINT FOR CIVIL RIGHTS VIOLATIONS**

**(42 U.S.C. §§ 1983, 1985, 1986; First, Fourth, and Fourteenth Amendments)**

**DEMAND FOR JURY TRIAL (If in best interest)**

TO THE HONORABLE DISTRICT COURT OF MINNESOTA

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I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to:
  - 28 U.S.C. § 1331 (federal question)
  - 28 U.S.C. § 1333(a)(3) (civil rights)

- 42 U.S.C. § 1983 (deprivation of constitutional rights)
  - 42 U.S.C. § 1985 (conspiracy to interfere with civil rights)
  - 42 U.S.C. § 1986 (neglect to prevent such violations)
2. Venue is proper in this district under 28 U.S.C. § 1331(b) because the events or omissions giving rise to these claims occurred in this district and all defendants reside or conduct business here.
- 

## II. PARTIES

3. Plaintiff: Andrew David Lloyd Miller a resident of Minnesota, is proceeding pro se.
  4. Defendant Molly Macone: An individual residing in North St. Paul, who acted jointly and/or under color of law with government agencies to deprive the Plaintiff of constitutional rights.
  5. Defendant Washington County Child Support Division: A governmental entity located in Minnesota responsible for enforcement actions, including financial seizures and recordkeeping, acting under color of law.
  6. Defendants John and Jane Does 1–10: Unknown individuals who accessed, altered, or disseminated Plaintiff’s private or sealed digital records and contributed to the deprivation of rights.
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## III. FACTUAL ALLEGATIONS

1. Improper License Suspension Without Due Process
  - Plaintiff’s driver’s license was suspended by the Washington County Child Support Division without prior notice, adequate opportunity to contest the action, or a valid underlying legal justification.
    - This suspension occurred in tandem with ongoing legal disputes Plaintiff initiated in Washington County challenging the legitimacy of past child support enforcement actions and arrears calculations.
2. Retaliation for Asserting Legal Rights
  - Shortly after filing motions and legal challenges in Washington County, Plaintiff was cited for “driving with a suspended license” and “speeding,” despite having no prior indication that their license had been revoked.
    - These citations appear to be retaliatory, occurring immediately after court filings that named Washington County actors and questioned the legitimacy of their conduct.
    - Plaintiff was denied any opportunity to resolve or clarify the license issue before punitive enforcement actions were taken, despite attempting to contact relevant departments.
3. Wrongful Enforcement of Child Support and Arrears

- Plaintiff has repeatedly contested the accuracy and legitimacy of the arrears and child support calculations, including overpayments and the wrongful garnishment or seizure of federal relief funds (e.g., COVID-19 stimulus checks and tax refunds).

- Defendants failed to correct or investigate these challenges, perpetuating financial harm and distress without valid legal basis.

4. Unlawful Seizure of Government Relief Funds

- Plaintiff's federal relief payments were intercepted without due process, including without court hearing, notice, or evidence of valid ongoing support arrears.

- These seizures occurred while Plaintiff was actively contesting the underlying child support enforcement actions.

5. Violation of Privacy and Digital Intrusion

- Unknown actors (John/Jane Does) accessed Plaintiff's private or sealed legal and digital records, including communications, court documents, and possibly school documents involving Plaintiff's children.

- This unauthorized access appears to have been used to interfere with Plaintiff's ongoing legal actions and may have been facilitated by or in coordination with known parties involved in the case.

6. Abuse of Process and Pattern of Targeted Harassment

- The cumulative actions—including license suspension, retaliatory citations, unlawful garnishments, digital surveillance, and obstruction of access to remedies—form a pattern of abuse intended to harass, silence, and punish Plaintiff for seeking justice through lawful means.

- These actions constitute not only individual violations but also a conspiracy to deprive Plaintiff of civil rights under color of law.

7. Failure to Intervene or Correct Harm (42 U.S.C. § 1986)

- Officials and agencies with the power to investigate, intervene, or correct unlawful acts (including license reinstatement and financial harm) failed to act, allowing the harm to continue despite multiple written and verbal notifications from Plaintiff.

- Their failure constitutes neglect to prevent known civil rights violations, in violation of 42 U.S.C. § 1986.

#### IV. CAUSES OF ACTION

Claim 1: Violation of 14th Amendment – Due Process & Equal Protection (42 U.S.C. § 1983)

Defendants unlawfully deprived Plaintiff of property (stimulus funds, tax refunds), interfered with parental rights, and upheld false records without meaningful opportunity to be heard or correct errors.

Claim 2: Violation of 4th Amendment – Unlawful Search, Surveillance, and Invasion of Privacy (42 U.S.C. § 1983)

Defendants and unnamed parties accessed private records, communications, or devices without authorization, warrant, or probable cause.

**Claim 3: Conspiracy to Violate Civil Rights (42 U.S.C. § 1985)**

Defendants conspired to alter, suppress, and misuse personal, financial, and legal information to damage Plaintiff's credibility and enforce wrongful penalties.

**Claim 4: Neglect to Prevent Civil Rights Violations (42 U.S.C. § 1986)**

Government officials and agencies who were informed of ongoing violations failed to act or intervene.

**Claim 5: Retaliation and Interference with Protected Rights (1st Amendment)**

Defendants acted in retaliation for lawful assertions of parental, religious, and free speech rights by suppressing or ignoring filings, and promoting false narratives.

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**V. REQUESTS FOR RELIEF**

Plaintiff respectfully requests the following relief:

1. Declaratory Judgment that Defendants violated Plaintiff's constitutional and federal statutory rights.
  2. Preliminary and Permanent Injunctions to stop further collection/enforcement of unlawful arrears and seize any ongoing surveillance or data tampering efforts.
  3. Compensatory Damages of at least \$100,000,000,000 for emotional distress, financial loss, loss of liberty, and reputational harm.
  4. Restitution and Reimbursement for unlawfully seized tax refunds and stimulus checks.
  5. Punitive Damages against individual Defendants acting willfully, maliciously, or in reckless disregard of Plaintiff's rights.
  6. Attorney's Fees and Legal Costs, per 42 U.S.C. § 1988 (if applicable in pro se relief).
  7. Corrective Action Order, compelling state or county agencies to audit and correct financial records and publicly clear Plaintiff's name.
  8. Monitoring or Oversight by federal court or independent third party to ensure compliance with federal standards.
  9. Any additional relief deemed just and proper by this Court.
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**VI. JURY DEMAND**

Plaintiff demands a jury trial on all claims so triable.

\*Please allow the ability to change depending

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**Respectfully submitted,**  
Andrew David Lloyd Miller  
Pro Se Plaintiff  
512 Yellow Brick Circle  
Chaska MN 55318  
952.500.1140  
Tristonllc123@gmail.com  
April 9, 2025

